



July 16, 2010

Centers for Disease Control and Prevention
Division of Healthcare Quality Promotion
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[Submitted via email to: HCNoro@cdc.gov]

Established in 1951, The Joint Commission is an independent, not-for-profit organization that evaluates and accredits approximately 17,000 health care programs and organizations in the United States. These include hospitals, laboratories, ambulatory care and office-based surgery centers, behavioral health, home care, hospice, and long term care organizations. Although accreditation is voluntary, a variety of federal and state government regulatory bodies recognize and rely upon Joint Commission decisions and findings for both Medicare and licensure purposes across all of the Joint Commission's accreditation programs.

The Joint Commission commends the Centers for Disease Control and Prevention for drafting a comprehensive guideline to address prevention and control of norovirus gastroenteritis outbreaks in the healthcare settings. We are especially pleased that the guidance document prioritizes the recommendations based on the strength of evidence and consensus in the field. This helps organizations make the best use of scarce resources to determine the most cost-effective mechanisms for preventing and controlling norovirus gastroenteritis outbreaks.

The Joint Commission recommends that CDC provide further guidance on how to apply the Kaplan criteria. As currently drafted, the guidance document lacks clarity as to how many of the four elements of the Kaplan criteria need to be met to determine whether gastroenteritis clusters or outbreaks of unknown etiology are attributable to norovirus.

Thank you for the opportunity to comment on the draft guidance. If you have any questions, don't hesitate to contact me or Marco A. Villagrana, Associate Director of Federal Relations, at (202) 783-6655.

Sincerely,

Patricia Kurtz, RN, MPA
Director
Federal Relations